

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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	:	12 Cr. 134 (BMC-MDG)
UNITED STATES OF AMERICA	:	<b>NOTICE OF MOTION</b>
	:	<b>IN SUPPORT OF</b>
- against -	:	<b>DEFENDANT IBRAHIM</b>
	:	<b>SULEIMAN ADNAN ADAM</b>
IBRAHIM SULEIMAN ADNAN ADAM HARUN,	:	<b>HARUN'S RESPONSE TO THE</b>
	:	<b>GOVERNMENT'S CLASSIFIED</b>
Defendant.	:	<b>EX PARTE FILING PURSUANT</b>
	:	<b>TO CIPA §4 AND RULE</b>
	:	<b><u>16(d), FED.R.CRIM.P.</u></b>
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**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Joshua L. Dratel, Esq., and all prior papers and proceedings herein, the defendant, IBRAHIM SULEIMAN ADNAN ADAM HARUN, will move before the Honorable Brian M. Cogan, United States District Judge for the Eastern District of New York, at the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, for an Order denying the government's request to file its CIPA §4 application *ex parte*, and compelling disclosure thereof to cleared defense counsel; and for any such other and further relief as to the Court seems just and proper.

Dated: New York, New York  
14 December 2015

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To: CLERK OF THE COURT

UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF NEW YORK

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